

**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
CONSUMER SERVICES DIVISION**

IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Escrow Agent Registration Act of Washington by:

International Escrow Inc.; and  
Grigory Yelkin, Ben Tran, and Slava Dekman,  
Principals,

Respondents.

NO. C-02-373-03-CO01

**CONSENT ORDER  
BETWEEN THE DEPARTMENT  
AND BEN TRAN**

COMES NOW the Director of the Department of Financial Institutions (Director), through her designee Chuck Cross, Acting Director and Enforcement Chief, Division of Consumer Services, and Ben Tran (hereinafter as “Respondent Tran”), and finding that the issues raised in the captioned matter may be economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order is entered pursuant to chapter 18.44 of the Revised Code of Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based on the following:

**I. AGREEMENT AND ORDER**

The Department of Financial Institutions, Division of Consumer Services (Department) and Respondent Tran have agreed upon a basis for resolution of the matters alleged in Statement of Charges and Notice of Intent to Assess Monetary Penalties, Revoke License, and Prohibit from Participation in the Escrow Industry No. C-02-373-03-SC01, (hereinafter referred to as “Statement of Charges”) entered August 29, 2003, (copy attached hereto). Pursuant to chapter 18.44 RCW, the Escrow Agent Registration Act (Act) and RCW 34.05.060 of the Administrative Procedure Act, Respondent Tran hereby agrees to the Department’s entry of this Consent Order and further agrees that the issues raised in the above captioned matter may be economically and efficiently settled by entry of this Consent Order. The parties intend this Consent Order to fully resolve Statement of Charges No. C-02-373-03-SC01, entered August 29, 2003.

Based upon the foregoing:

CONSENT ORDER  
BEN TRAN

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DEPARTMENT OF FINANCIAL INSTITUTIONS  
Division of Consumer Services  
PO Box 41200  
Olympia, WA 98504-1200  
(360) 902-8795

1 A. It is AGREED that the Department has jurisdiction over the subject matter of the activities discussed  
2 herein.

3 B. It is AGREED that the parties shall be bound by the terms and conditions of this Consent Order as set  
4 forth herein.

5 C. It is AGREED that Respondent Tran has been informed of his right to a hearing before an administrative  
6 law judge, and that he has waived his right to a hearing and any and all administrative and judicial review of the issues  
7 raised in this matter, or of the resolution reached herein.

8 D. It is AGREED that Respondent Tran understands that failure to abide by the terms and conditions of this  
9 Consent Order may result in further legal action by the Director. In the event of such future legal action, Respondent  
10 Tran may be responsible to reimburse the Director for the cost incurred in pursuing such action, including but not  
11 limited to, attorney fees.

12 E. It is AGREED that Respondent Tran has provided the Department a declaration dated \*\*\*\*, 2003 and  
13 stating in part:

- 14 • Respondent Tran was a principal of International Escrow Inc. ("International") when it applied for an  
15 escrow agent license with the Department on or about April 12, 1999.
- 16 • Respondent Tran's ownership interest in International terminated on or around May 18, 1999, after  
17 which date Respondent Tran's interest was only that of a creditor.
- 18 • Respondent Tran had no knowledge of the activities of International following the termination of his  
19 ownership interest, including, but not limited to, operating without a Designated Escrow Officer,  
20 failing to properly account for and administer funds held in trust, failing to pay annual license fee,  
21 maintenance of surety bonds and engaging in business without a license.

22 It is further AGREED that a true and accurate copy of same declaration dated \*\*\*\*, 2003 is attached hereto and  
23 incorporated by this reference as if fully set forth herein.

24 F. The Department ACKNOWLEDGES that, as of the entry of this Consent Order, available evidence does  
25 not indicate that Respondent Tran was involved in the violations alleged in the Statement of Charges.

G. Respondent Tran REPRESENTS that, as of the date of entry of this Consent Order, he is not participating  
in the escrow industry in Washington.

1 H. Respondent Tran AGREES that, in the future, should he wish to participate in the escrow industry in  
2 Washington as a Designated Escrow Officer or in any other capacity, he shall fully and completely comply with the  
3 Escrow Agent Registration Act and the rules adopted thereunder, and any and all other relevant statutes and regulations  
4 in place at that time.

5 I. It is AGREED that the conduct giving rise to the issuance of the above-referenced Statement of Charges  
6 will not be considered by the Department in the assessment of any future application for an escrow agent license in the  
7 state of Washington, in the event Respondent Tran wishes to pursue such application.

8 J. It is AGREED that Respondent Tran has voluntarily entered into this Consent Order, which is effective  
9 when signed by the Director's designee.

10 K. It is AGREED that Respondent Tran has read the Consent Order in its entirety and fully understands and  
11 agrees to all of the same.

12 **RESPONDENT:**

13  
14 /C/ \_\_\_\_\_ December 29, 2004 \_\_\_\_\_  
Ben Tran Date

15  
16  
17 THIS ORDER ENTERED THIS 12th DAY OF ~~DECEMBER~~ January, 2003.

18  
19 /C/ \_\_\_\_\_  
Chuck Cross  
20 Acting Director and Enforcement Chief  
21 Division of Consumer Services  
22 Department of Financial Institutions  
23  
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